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September 30, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Electronically Filed

Re: CC Docket No. 95-116; WC Docket No. 09-109

Dear Ms. Dortch:

I write on behalf of Neustar, Inc., to submit the attached report, "A Review of Security Requirements for Local Number Portability Administration," prepared by The Chertoff Group. The executives from The Chertoff Group who contributed to the report include former DHS Secretary Michael Chertoff, former DHS Deputy Secretary Paul Schneider, former DHS Undersecretary for Cybersecurity Mark Weatherford, former DHS Deputy Chief of Staff Adam Isles, former NSA Inspector General and ODNI Counterespionage Executive Joel Brenner, and former DoD Deputy Assistant Secretary of Defense for Cyber Policy Robert Butler.

At Neustar's request, The Chertoff Group examined security-related bid terms in the RFP, assessed the national security risks associated with administration of LNP services, and then assessed the extent to which the bid terms addressed those risks. In undertaking this work, and as documented in its report, The Chertoff Group applied widely accepted national and international standards.

Particularly significant are The Chertoff Group's conclusions with regard to remedying identified shortcomings in the RFP and selection process.

Finally, the FCC's decision on *how* to proceed to incorporate better security requirements will have a substantial impact on the level of security it actually achieves. The defects cited in this report cannot be remedied simply by post-award contract negotiation. Several remedies are available, ranging from canceling the procurement and conducting a new competition to a more limited step involving the reopening of negotiations with respect to additional security

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requirements. We are not in a position to weigh the relative operational impact of these corrective options, but we do conclude that the current deficiencies and resulting impact on the local number portability system are serious, that failure to include requirements widely recognized as crucial to security likely had a significant impact on offerors' proposals, and that the NAPM would also likely lose significant leverage to obtain a best value proposal if the FCC permitted it to simply address these deficiencies in a post-award negotiation.¹

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Sincerely,

Handwritten signature of Aaron M. Panner in black ink, with the initials 'mlb' written at the end of the signature.

Aaron M. Panner

Enclosure

cc: Daniel Alvarez
Nicholas Degani
Rebekah Goodheart
David Goldman
Amy Bender
Julie Veach
Jonathan Sallet
Kris Monteith
David Simpson
Roger Sherman
Lisa Gelb
Michele Ellison
Randy Clarke
Ann Stevens
Sanford Williams
Diane Griffin Holland
Neil Dellar

¹ Report Executive Summary, p. 4.